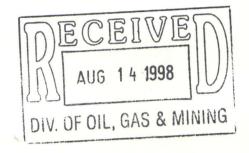
m/049/031

Western Aggregates Holding Corp.

August 14, 1998

Mr. D. Wayne Hedberg
Permit Supervisor
Minerals Regulatory Program
Department of Natural Resources
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801



Subject:

Response to Comments - Valley Asphalt Inc's Lehi Quarry (M/049/031).

Utah County

Dear Mr. Hedberg:

The following is a response to DOGM's comments on Valley Asphalt's Notice of Intent to commence large mining operations in Lehi Quarry, Utah County. Where there is a contradiction, the following information supercedes the information provided in the previous NOI for the proposed mining operation. The three phases shown in the earlier submittal has been replaced by a single phase. Please contact me at 485-2270 if you have further questions. Thank you for your assistance.

Sincerely,

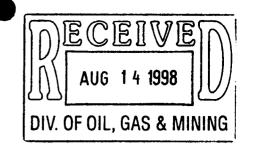
Western Aggregates Holding Corporation

Arjun Ram, P.E.

Civil/Environmental Engineer



R647-4-104 - Operator's Surface and Mineral Ownership



The name and the address of the surface owner in the project area is provided below:

Leased by Peck Rock Products from State of Utah, Division of Natural Resources Allred's Project - Lehi Quarry (M049031)

R647-4-105 – Maps, Drawings & Photographs

105.1 Topographic Base Map: A topographic base map showing the project area is attached. The map is a USGS 7.5 minute (1:24000 scale) map of the Jordan Narrows quadrangle, Utah. The pit is located North of Highway 73, approximately 6 miles west of I-15 past the city of Lehi. The map shows some existing unimproved roads (trails). No streams, springs, or other bodies of water are present inside or within 500 feet of the property. There are no buildings, landing strips, or oil and gas pipelines inside or within 500 feet of the property.

105.2 Surface Facilities Map: All areas that could potentially be disturbed during the entire period of operation (up to 50 years) have been included in the map. The area labeled as "Construction Fill Borrow Site" has been included in the acreage for disturbed areas. The proposed surety estimate will be for the entire area to be excavated.

105.3 Drawings or Cross Sections: Typical cross sections for the phase 1 mine area have been included in the map.

Reclamation Treatments Map: All potential disturbances have been included in the attached map. The potential area to be disturbed as a result of the various activities to be performed are listed below:

Berm Area: 9.7 acres – Includes the actual areas of the berm, growth media stockpile, and related activities. Any excess soil on the berm will be leveled, a minimum of 6" of top soil will be placed in areas where top soil has been stripped and the area will be seeded in accordance with the vegetation plan.

Asphalt and Crushing Plants Yard Area: 16.0 acres – Includes the area where the crushing spread and the asphalt plant are set-up. A minimum of 6" of top soil will be placed in areas where top soil has been stripped and the area will be seeded in accordance with the vegetation plan. The sediment pond area will be leveled to prevent water stagnation before revegetation efforts are undertaken.

Excavation Area: 95.3 acres – Includes the area that will be excavated. A minimum of 1-foot of top soil will be placed in the areas excavated and the area will be seeded in accordance with the vegetation plan.

Access Road Area: 0.57acres – At the completion of the operations, the asphalt will be ripped up, a minimum of 6 inches of top soil will be placed and the area will be seeded in accordance with the revegetation plan.

High Wall/Bench Area: 24.0 acres – Includes the area that will be excavated near the east, west and north property boundaries. A variance is requested to exempt this area from revegetation because of the difficulty in the implementation of the various steps necessary for successful revegetation and subsequent care until a viable plant community is established.

105.3.15 Sediment Ponds - A drawing and location of the sediment pond has been provided in the attached Mine and Reclamation Map. The pond is located in an area that is naturally low. The mine will be graded to allow most of the run-off water to drain to the pond. The maximum 10-year 24-hour storm from 1988-1997 at Pleasant Grove (near Lehi) was 1.36" (September 7, 1991). The mine will be reclaimed simultaneously with the excavation. The approximate drainage area at any one time is estimated to be about 30 acres. Assuming that 50% (excluding infiltration, etc.) of all the water that falls in the drainage area makes it to the detention pond, a total capacity of approximately 1.7 acrefeet [1.36"/(12"/feet) x 30 acres x 0.5] is required. A simple detention basin will be progressively constructed which can approximately hold up to 2-acre feet of water/sediment. If this storage capacity is found to be inadequate from experience, then the capacity will be increased adequately by increasing the size and/or depth of the pond. The detention pond will be lined with gravel to promote water drainage/infiltration. The water will be used or allowed to evaporate. The sediment will be skimmed from the bottom of the pond and used or disposed. There are no perennial streams that will be affected as a result of the excavation. The probability of water run-off from the excavation site resulting in any flooding of adjacent areas and causing damage is very low.

R364-4-106 – Operation Plan

106.2 Type of operations conducted, mining method, processing, etc. – Typical equipment to be operated at the site are as follows:

Material Processing Equipment

Crushers
Screens
Conveyor belts and stackers
Mobile equipment such as loaders, dozers, etc.
Processed material stockpiles

Asphalt Plant Equipment
Asphalt plant drum drier
Storage bins
Fuel storage tanks inside secondary containment
Asphalt loadout silo

Description of Processes

Aggregate Production:

The material is drilled, blasted and transported to the processing plant where it is loaded into a feeder. The material is then crushed and screened into various products by a combination of crushers, screens and conveyor belts. The product is stored in stockpiles. The actual products produced will depend on the market demand. The material from the stockpiles is then loaded into trucks and hauled to project sites or loaded in the asphalt plant silos.

Asphalt Production:

The aggregate material is loaded into the bins and fed into a drum drier to remove the moisture. Asphalt oil is then injected and mixed with aggregate to produce asphaltic concrete. The asphaltic concrete is loaded into a silo from where it is loaded into trucks and transported into job sites.

106.3 Estimated acreage disturbed and reclaimed – This item has been addressed under 105.3.

106.6 Plan for protecting and redepositing soils – The top soil will be stockpiled in the berm area along the south edge of the property as shown in the Mine and Reclamation Map. The top soil will be vegetated with the following vegetation mix:

Piute Orchard Grass @ 1lb/acre Alfalfa @ 1.5 lb/acre Small Burnett 2 @ lb/acre Thickspike Wheat @3 lb/acre

106.8 Depth to Groundwater – The original application stated that groundwater was found at 4520 feet. This is an error. The groundwater depth is 427.1 feet as shown in the attached well driller's report.

106.9 Proposed location and size of water treatment ponds – This information has been provided above in item 105.3.15.

R647-4-107 – Operation Practices

107.1 Public Safety and Welfare – Minimal trash and debris will be generated from the operations. All trash and debris such as scrap metal, tires, etc. will be hauled out to a landfill periodically. There will be no permanent on-site trash disposal facility. Measures to prevent public access to the highwall areas during operations will include posting of bold hazard signs at an interval of 50 yards along the highwall and/or the erection of a fence in highly dangerous areas.

R647-4-109 Impact Assessment

109.4 Slope stability, erosion control, air quality, safety
The grading plan has been modified to limit the overall slopes of the highwalls on the south, east and west facing slopes to a maximum of 45 degrees. Therefore, a variance is not sought for the slope of the highwall, but only for the revegetation of the highwall and bench areas.

R647-4-110 - Reclamation Plan

110.1 Current and post-mining land use – It is recognized that the current land use also includes wildlife habitat.

110.2 Roads, highwalls, slopes, drainages, pits, etc., reclaimed

The areas to be reclaimed are as follows:

Berm Area: 9.7 acres – Includes the actual areas of the berm, growth media stockpile, and related activities. Any excess soil on the berm will be leveled, a minimum of 6" of top soil will be placed in areas where top soil has been stripped and the area will be seeded in accordance with the vegetation plan.

Asphalt and Crushing Plants Yard Area: 16.0 acres – Includes the area where the crushing spread and the asphalt plant are set-up. A minimum of 6" of top soil will be placed in areas where top soil has been stripped and the area will be seeded in accordance with the vegetation plan. The sediment pond area will be leveled to prevent water stagnation before revegetation efforts are undertaken.

Excavation Area: 95.3 acres – Includes the area that will be excavated. A minimum of 1-foot of top soil will be placed in the areas excavated and the area will be seeded in accordance with the vegetation plan.

Access Road Area: 0.57acres – At the completion of the operations, the asphalt will be ripped up, a minimum of 6 inches of top soil will be placed and the area will be seeded in accordance with the revegetation plan.

High Wall/Bench Area: 24.0 acres – Includes the area that will be excavated near the east, west and north property boundaries. A variance is requested to exempt this area from revegetation because of the difficulty in the implementation of the various steps necessary for successful revegetation and subsequent care until a viable plant community is established.

The original NOI mentions using fertilizer or organic mulch amendments to enhance revegetation. Fertilizer will be used to enhance the success of revegetation at the rate of 100 lb/acre of diammonium phosphate. Also, other factors necessary to promote

revegetation success such as leaving areas in rough surface condition, site grading to promote water retention in areas that are being revegetated, etc. will be implemented.

110.5 Revegetation Plan - The seed mix proposed by the DOGM is acceptable.

R647-4-111 Reclamation Practices

- 111.1 Public Safety and Welfare
- 111.1.12 Disposal of Trash and Debris No on-site burial of construction debris is proposed for this operation
- 111.1.15 Constructing berms/fences above highwalls Adequate warning signs will be posted at an interval of every 50 yards to deter access from above the highwalls. Fences will be constructed at critical locations above the highwalls as needed. The highwall is constructed with a series of 20 foot benches as shown in the cross section drawings in the Mine and Reclamation Map. This will minimize damage from potential rock falls.
- 111.7 Highwalls stabilized at 40 degrees or less The grading plan has been modified to limit the overall slopes of the highwalls on the south, east and west facing slopes to a maximum of 45 degrees. Therefore, a variance is not sought for the slope of the highwall, but only for the revegetation of the highwall and bench areas.
- 111.12 Topsoil Redistribution The topsoil will be spread to a thickness of 6 inches where the existing top soil has not been removed (i.e., in the equipment yard area and the berm area). The topsoil will be spread to a thickness of 12 inches in areas where the topsoil has been removed (i.e. the excavation area).

R647-4-112- Variance

The grading plan has been modified to limit the overall slopes of the highwalls on the south, east and west facing slopes to a maximum of 45 degrees. Therefore, a variance is not sought for the slope of the highwall, but only for the revegetation of the highwall and bench areas.

R647-4-113 – Surety

The revised calculations are attached.

WLI

WELL DRILLER'S REPORT

State of Utah Division of Water Rights

For additional space, use "Additional Well Data Form" and attach Well Identification CHANGE APPLICATION: a21980(54-1008) Note any changes Owner Valley Asphalt Inc P.O. Box 220 Spanish Fork, UT 84664 Contact Person/Engineer: Note any changes Well Location COUNTY: Utah NORTH 500 feet EAST 2400 feet from the W1 Corner of SECTION 16, TOWNSHIP 5S, RANGE 1W, SLB&M. Location Description: (address, proximity to buildings, landmarks, ground elevation, local well #)_ 6 mi W of Lehi **Drillers Activity** 4-15-98 Start Date: 4-30-98 Completion Date: Check all that apply: New Repair Deepen Abandon Replace Public Nature of Use: DEPTH (feet) BOREHOLE DRILLING METHOD **DRILLING FLUID FROM** DIAMETER (in) TO 0 40 GAM Rotary 10 3/4 40 469 FOAM Rotary 469 9718 585 Core Rotar UNCONSOLIDATED CONSOLIDATED Well Log ATER **DESCRIPTIONS AND REMARKS** ROCK TYPE COLOR (include comments on water quality if known.) DEPTH (feet) **FROM** TO XX Resp 12 0 IJ 23 TOA 27 $\lambda 3$ Gray Cineatone Gravels ิลว Weathered Broken 70 Limestone Redland 70 Linestone Tanlaray 88 88 104 Limitere Hard TON 104 119 4902 I /MIN drilling 119 180 180 198 198 230 Static Water Level Water Level 427-1 feet 5-20-98 Flowing? ☐ Yex ☐ No If Flowing, Capped Pressure_ PSI Method of Water Level Measurement GL Point to Which Water Level Measurement was Referenced Height of Water Level reference point above ground surface □°C □ ° F feet Temperature

Valer Right # Q21930 (544008) ADDITIONAL WELL DATA FORM

OWNER NAME VAILEY AS LAST

Page 2 of 2

OWNE	K IVAME	<u>_K</u>		-	\vdash				7,				Page Z of Z
Well La	DE	W	1 !		U	NO.	ON	SÕĮ	D.	ATE	D CONSOLIDATI	:D	
DEPTH FROM	i (feet)	ATER	1	le le	CLAY	SILT	SAND	GRAVEL	COBBLES	B C H	ROCK TYPE	COLOR	DESCRIPTIONS AND REMARKS (include comments on water quality if known.)
230	247	Ι						$oxed{I}$			Lipseton	2 Red	
247	254				Ц					L	Thale	Block	
<u> </u>	267	\perp			Ц	1	1	\downarrow	\downarrow	1	Shole	Ked	
267	200	\perp				1	1	\perp	1	$oldsymbol{\perp}$	Skele	black	
380	333	\bot				4	1	\downarrow	\downarrow	\perp	Stale	Real	
333	339	\downarrow				1	4	1	ŀ	\downarrow	Shale	Block	The transfer of the control of the c
339	360	1	$\lfloor \cdot \rfloor$	_	4	4	4	+	1	<u> </u> -	Thate	Root	
860	388	\vdash	H		4	+	+	╪	\bot	╀	Livethou	17 (7.	·
388	395	-	\sqcup	\dashv	4	4	+	4	+	╀-	Livertone	-	
345	410	H	-	4	+	+	\downarrow	\downarrow	+	╀	Livetone		
410	420	\vdash	\dashv	\dashv	4	+	+	╀	+	╀	Shale	gray the	
420	429		\dashv	\dashv	+	+	+	+	╀	+	Cimelon	Red	
429	509	Å	\dashv	4	+	+	+	╀	+	╀	Linestone	gray tool	
_	585	M	-	-	+	+	+	\downarrow	╀	╀	riminand	year	
585	600	Н	-	\dashv	\downarrow	+	\downarrow	\downarrow	\downarrow	<u> </u>	Shole	Brack	
		Н	\dashv	+	+	+	╀	+	+	\vdash	 		
		H	\dashv	4	+	+	╀	╀	╀	-		-	
· .		H	-	4	+	+	\downarrow	╀	╀	-			
		Н	-	+	+	+	+	+	+	╀			
		Н	+	4	+	+	+	╀	+	-			
		Н	+	+	+	╀	+	╀	╀	┢			
		H		+	+	╀	╀	╀	+	-			
		H	\dashv	+	+	+	╁	╀	+	-			
		H	\dashv	+	+	╁	+	╁	╁	-			
·	<u> </u>	H	+	+	+	╀	╀	╁	\vdash	\vdash			
		H	-+	+	+	╀	╀	\vdash	-				
		H	+	+	+	+	╀	╀	╀				
		H	+	+	+	+	+	-	\vdash			-	
		H	+	+	╀	╀	+	\vdash	\vdash	-			
		\vdash	\dashv	+	+	+	+	+	\vdash				
		\forall	+	+	\dagger	t	+	t	+		 -		
		<u></u>	1			1_	١.	<u>, </u>	<u></u>	<u> </u>	1	<u> </u>	

Construct	ion Info	rmation							The second secon		
DEPTH	(fcet)	CASIN			DEPTH	(feet)	SCREEN		ORATIONS []		
FROM	то	CASING TYPE AND MATERIAL/GRADE	WALL THICK (in)	NOMINAL DIAM. (in)	FROM	то	SLOT SIZE OR PERF SIZE (in)	SCREEN DIAM. OR PERF LENGTII (in)	SCREEN TYPE OR NUMBER PERF (per round/interval)		
+2	451	A53B Steel	-320	85/8	451	585	1/8	8"	BROWS		
0	40	12"Steel	-3.50	12"							
					and the second s						
		iguration: Well Sea be: WOW	<u> </u>	_ Perforato	r Used:	FACTO	ccess Port Prov	_	□ No		
DEPTH	(feet)	FIL	TER PACK	GROUT/I	PACKER / A	BANDO	NMENT MATI	ERIAL			
FROM	то	ANNULAR MATERIAL and/or PAC	"ABANDON! KER DESCRI		RIAL		y of Material Used f applicable)		GROUT DENSITY (lbs./gal.,# bag mix, gal./sack etc.)		
3 85	380	3/8 Gravel		Barra		90	bogs	50 \$ Bags			
380	90	Waskel Pea G	raval	· · · · · · · · · · · · · · · · · · ·				- at /-	22 0116		
0	40	Bentonite				9 B	ags	50°4/3	5 9000 920		
Well De		ent / Pump or Bail Tests Method			Y	ield	Units Check One GPM CFS	DRAWDOWN (fi)	TIME PUMPED (hrs & min)		
4 29		Ain GRT			6	3	X _	<u>&</u>	6 lus		
				THE RESERVE OF THE PROPERTY OF							
-	Description	on: Bub	00		power:	5 on comp	1	Depth: 54			
Commer	te Dov	cription of construction activity	additional m	aterials used	l, problems	encounter	red, extraordinar	у			
	eirc	umstances, abandonment / proceed B! Kincle	Con Con	additional we	to 6	500	space.				
Well D	riller Sta	ternent This well was drilled this report is comple	or abandone	d under my	supervision, of my knowl	accordin	g to applicable r	ules and regulation	ons, and		
Nam	<u>21</u>	MMEY MON WELL (Persog, Firm, or Corporation	Som	rce c	lue	License	()	198			
Signa	ature	Mo CLicensed Well I				Date	\$ /20	140			

RECLAMATION SURETY ESTIMATE Company Name Valley Asphalt, Inc. Utah County Utah County

Prepared by Utah State Division of Oil, Gas & Mining

-This estimate is based on the reclamation plan in the NOI dated

-I revised August 14, 1998

-All structures & facilities to be dismantled, demolished & removed from the site as salvage or debris
-All concrete foundations & pads are to be crushed & removed from the site as product or debris
-Top soil from Berm area will be spread and additional top soil will be trucked in as needed
- A minimum of 12" of top soil to be spread in the berm area and operations area and then seeded
- Paved road entrance to be ripped and a minimum of 6" of top soil to be spread in the pit bottom area and then seeded

Note: actual unit costs may vary according to site con	ditions	last unit i	cost update	08/18/97					
-Amount of disturbed area which will receive reclamation treatments = 121.6 acres									
-Estimated total disturbed area for this mine = 145.6 acres									
Activity	Quantity	Units	\$/unit	\$					
Safety gates, signs, etc. (mtls & installation)	20	sum	200	4,000	(1)	DOGM lu			
Demolition of buildings & facilities	20,000	CF	0.23	4,600	(2)	Means He			
Debris & equipment removal - trucking	8	trips	48	384	(3)	Means 19			
Debris & equipment removal - dump fees	200	CÝ	6	1,200	(4)	Means 19			
Debris & equipment removal - loading trucks w/FE loader	15	hours	166	2,490	(5)	Rental Ra			
Demolition & debris removal - general labor	32	hours	15	480	(6)	DOGM as			
Regrading facilities areas (est 50% of facilities area)	8.0	acre	415	3,320	(7)	Means 19			
Regrading waste dump slopes	0	CY	0.32	0	(8)	Means 19			
Ripping waste dump tops	0.0	acre	363	0	(9)	Means 19			
Ripping "facilities area"	8.0	acre	570	4,560	(9)	Means 19			
Ripping mine area	95.3	acre	570	54,321	(9)	Means 19			
Ripping pit access roads		acre	570	325	(9)	Means 19			
Creating safety berms or barriers around highwalls	11,700	LF	0.1	1,170	(10)	Means 19			
Ripping access roads - dozer		acre	570	325	(9)	Means 19			
Regrading access roads - dozer		acre	415	237	(7)	Means 19			
Sidecast mtl replacement on steep roads- trackhoe	2,340		0.85	1,989		Contracto			
Surface drainage restoration or construction	1170	LF	0.1	117	(10)	Means 19			
replacing topsoil - dozer	174,942		0.32	55,981	(8)	Means 19			
replacing topsoil - scraper	174,942		0.32	55,981	(?			
replacing topsoil -truck, FE loader & dozer	174,942	CY	0.32	55,981	(?			
Mulching (2 ton/acre alfalfa)		acre	160	0	(12)	GUESST			
Composted manure (10 ton/acre)		acre	800	0	(GUESST			
Fertilizing (100 lb/acre diammonium phosphate)	121.6		90	10,941		GUESST			
Broadcast seeding (~20 lb/acre)		acre	170	0		GUESST			
Drill seeding (~13 lb/acre)	121.6		220	26,745		GUESST			
Hydroseeding	0.0	acre	800	0	(16)	GUESST			

50

1000

3 equip

Total
Rounded surety amount in yr 2002-\$

5 days Subtotal

Subtotal

400

3,000

1,780 290,328

29,033 \$319,361 37,407 \$356,768

(17) DOGM as

(18) DOGM ge

(17) Means 19

GENERIC RECLAMATION ESTIMATE	(e:/deta/bond/mine-bnd.wb2)
insert mine company name here	test revision 04/18/97
insert mine name here	filename M000-000 WB2 page "ESTIMATE"
M/000/000	insert county name
Prepared by Utah State Division of Oil, Gas & I	
last unit cost update	04/18/97

General site cleanup & trash removal (50% of total area)

Equipment mobilization

Reclamation Supervision

Escalate for 5 years at 2.24% per yr

Average cost per disturbed acre =

10% Contingency

iest pint cost apaete	<u>04/10/07</u>
(1)	DOGM lump sum assumed
(2)	Means Heavy Construction Cost Data 1997, 020-604-0100, mixture of blo
(3)	Means 1997, 020-620-5100, \$0.48/mile for >8CY truck; assumed 100 mile
(4)	Means 1997, 020-612-0320, avg, bldg construction mtls
(5)	Rental Rate Blue Book 4/96, Cat 988B, 7CY, & Means 1997, Crew B-10U
(6)	DOGM assumed wage for unskilled general labor
(7)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, mtl 2550 lb/CY
(8)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, mtl 2550 lb/CY
(9)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, multi shank rip
(9)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, multi shank rip
(9)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, multi shank ripp
(9)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, multi shank rip
(10)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, mtl 2550 lb/CY
(9)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, multi shank rip
(7)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, mtl 2550 lb/CY
(11)	Contractor's actual costs, 1991 at E/053/012, Cat 225 Excavator, 20 ft wid
(10)	Means 1997 & Rental Rate Blue Book 4/97: Cat D10N, U, mtl 2550 lb/CY
(12)	GUESSTIMATE
(13)	GUESSTIMATE
(14)	GUESSTIMATÉ
(15)	GUESSTIMATE
(16)	GUESSTIMATE
(17)	DOGM assumed cost
(18)	DOGM general estimate
(17)	Means 1997, 010-036-0180, project manager, minimum \$1780/wk
10% Contingency	0
Escalate for 5 years at 2.24% per vr	Subtotal \$0 0
Lacarate for a years at 2.24 % per yr	Total \$0
	Rounded surety amount in yr 2002-\$ \$0
Average cost per disturbed acre =	ERR

Pacifiherarea mograding 8000 0.

Ripping 60.0